



U.S. Department of Justice

*United States Attorney
Southern District of New York**The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

June 4, 2018

BY ECF

The Honorable Ronnie Abrams
United States District Judge, Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: United States v. Galanis, et al., S3 16 Cr. 371 (RA)

Dear Judge Abrams:

The Government respectfully submits this letter in advance of the anticipated cross-examination of Hugh Dunkerley to identify for the Court which exhibits we presently intend to object to if offered during defense cross-examinations of Mr. Dunkerley.

The Government respectfully requests the Court address the admissibility of these exhibits either during the morning break or at the lunch recess.

GX	<u>Objection</u>
510	Dunkerley is not a percipient witness for this since he is not a signer on the account
522	Dunkerley is not a percipient witness for this since he is not a signer on the account (see GX 521).
525	Dunkerley is not a percipient witness for this since he is not a signer on the account (see GX 521)
856	Hearsay
1573-74	Hearsay
<u>DX</u>	
3320	Hearsay
1920 Bel Air video (unmarked)	Relevance, Hearsay, 403

3709-13	Relevance
4007M	Hearsay
4020J	Hearsay
4023A, C-F	Hearsay
4049	Hearsay
4051	Hearsay
4061	Hearsay
4062	Hearsay
4065	Hearsay
4131	Hearsay
4716	Hearsay
4722	Hearsay
4754	Hearsay

Respectfully submitted,

ROBERT KHUZAMI

Attorney for the United States, Acting Under
Authority Conferred by 28 U.S.C. § 515

By: /s/ Negar Tekeei
Rebecca Mermelstein
Brendan F. Quigley
Negar Tekeei
Assistant United States Attorneys
(212) 637-2360/2190/2482

Enclosures

cc: Counsel of record (via ECF)